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9 *Attorneys for Defendant La Bella Vita*
10 *Equestrians LLC*

11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF NEVADA**

13 LUCKY LAKE FARM & WATER LIMITED
14 PARTNERSHIP, a Saskatchewan Limited
15 Partnership; and SWIFT RIVER FARMS, LTD.,
an Alberta corporation,

16 Plaintiffs,

17 v.

18 GORDON CLARK, an individual; RODNEY
19 KOCH A/K/A GORDON CLARK, an individual;
20 CINDY LOU ELLEN KOCH, an individual;
21 KRYSTAL LEE CLARK, an individual;
MICHAEL ROSE, an individual; MICHAEL
22 ROSE & ASSOCIATES STRATEGIC
CONSULTING INC., a Nova Scotia corporation;
23 JEFF HOUGHTON, an individual; TW
INTERNATIONAL INVESTMENTS LTD., a
24 Bahamian Registered company; TW ADVISORS
LTD., a British Virgin Islands registered company;
25 TW FUNDS INC., a British Virgin Islands
registered company; LA BELLA VITA
26 EQUESTRIANS LLC, a Nevada limited liability
company; LA BELLA VITA INTERNATIONAL
27 EQUINE SALES LLC, a Nevada limited liability
company; LIQUID LUXURY GROUP LLC, a

CASE NO. 2:23-cv-01768-GMN-MDC

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
FOR DEFENDANT LA BELLA VITA
EQUESTRIANS LLC TO RESPOND
TO FIRST AMENDED COMPLAINT
[ECF NO. 30]**

(FIRST REQUEST)

1 Nevada limited liability company;
2 BLACKSTONE LUXURY GROUP LLC, a
3 Nevada limited liability company; DOES I-XX,
4 inclusive; and ROE CORPORATIONS I-X,
5 inclusive,

6 Defendants.

7 Plaintiffs LUCKY LAKE FARM & WATER LIMITED PARTNERSHIP and SWIFT
8 RIVER FARMS, LTD., (collectively "***Plaintiffs***"), and Defendant LA BELLA VITA
9 EQUESTRIAN LLC ("***Defendant LBVE***"), by and through their respective counsel, hereby
10 stipulate and agree as follows:.

- 11 1. On December 5, 2023, Plaintiffs filed their First Amended Complaint (ECF No. 30).
- 12 2. On January 29, 2024, Defendant LBVE was served with the Summons and First
13 Amended Complaint.
- 14 3. Defendant LBVE's response to the First Amended Complaint is due February 20, 2024.
- 15 4. The parties hereby agree and stipulate that Defendant LBVE's response to the First
16 Amended Complaint is now due on or before March 8, 2024.
- 17 5. Good cause exists for this extension to permit LBVE an opportunity to confer with its
18 recently-retained counsel and attempt to resolve as many issues with Plaintiffs as
19 possible prior to filing a response to the Complaint.

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6. This Stipulation is made in good faith and not for any purposes of delay.

Dated: February 15, 2024.

HOLLEY DRIGGS

/s/ Jason D. Smith

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*Attorneys for Defendant La Bella Vita
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Dated: February 15, 2024.

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/s/ Shamus S. Flynn

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Attorneys for Plaintiffs

IT IS SO ORDERD.



Maximiliano D. Couvillier III
UNITED STATES MAGISTRATE JUDGE

DATED: February 16, 2024